

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,  
Debtor.

Case No. 23-13237-pmm

Chapter 11

**Debtor's Application to Employ MPN Realty Inc.  
as Debtor's Real Estate Agent**

**AND NOW**, Applicant Tri-State Paper, Inc., by and through its counsel, applies to this Court for entry of an order authorizing employment of a professional in accordance with L.B.R. 2014-1. In support of this application, the Applicant states as follows:

1. The Applicant is the debtor in the above chapter 11 bankruptcy case.
2. The Applicant seeks to retain MPN Realty, Inc., (the "Real Estate Agent") to serve as its real estate agent to prosecute the sale of its real property located at:
  - a. 4500 North Third Street in Philadelphia, Pennsylvania, and
  - b. 2044 E Clementine Street in Philadelphia, Pennsylvania.
3. Employment of the Real Estate Agent is necessary for the Applicant to adequately perform its duties as a debtor.
4. The Court previously approved US Realty Associates Inc. as the Debtor's real estate agent, but the Debtor wishes to change agents because it does not believe US Realty has made a serious effort to sell the property.
5. The Real Estate Agent has been selected because it is a commercial real estate brokerage company specializing in the sale of property in the Philadelphia area.
6. Upon information and belief, the Real Estate Agent has no connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.
7. Upon information and belief, the Real Estate Agent does not hold an adverse interest to the estate, does not represent an adverse interest to the estate, and does not represent or hold

any interest adverse to the debtor or the estate with respect to the matter for which they will be retained under 11 U.S.C. § 327(a).

8. The proposed arrangement for compensation is outlined in the declaration of the Real Estate Agent, which is attached as Exhibit A.

9. The Applicant respectfully requests authorization to employ the Real Estate Agent to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

**NOW, THEREFORE**, the Applicant asks this Court to grant relief in the form of order attached and to grant such other relief in its favor as may be necessary and proper under the law.

Date: June 10, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By: /s/ Michael A. Cibik  
Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
mail@cibiklaw.com